

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

THOMSON REUTERS ENTERPRISE )  
CENTRE GMBH and WEST PUBLISHING )  
CORPORATION, ) C.A. No. 20-613-SB  
 )  
Plaintiffs/Counterdefendants, ) **JURY TRIAL DEMANDED**  
 )  
v. ) **PUBLIC VERSION**  
 )  
ROSS INTELLIGENCE INC., )  
 )  
Defendants/Counterclaimant. )

**LETTER TO THE HONORABLE STEPHANOS BIBAS FROM DAVID E. MOORE**

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*Attorneys for Defendant/Counterclaimant  
ROSS Intelligence, Inc.*

Dated: August 3, 2022  
10286849 / 20516.00001

Public Version Dated: August 10, 2022



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August 3, 2022

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**VIA ELECTRONIC FILING**

The Honorable Stephanos Bibas  
James A. Byrne United States Courthouse  
601 Market Street  
Philadelphia, PA 19106

**PUBLIC VERSION**

Re: *Thomson Reuters Enterprise Centre GmbH et al. v. ROSS Intelligence Inc.*,  
C.A. No. 20-613-SB

Dear Judge Bibas:

We write on behalf of ROSS Intelligence, Inc. (“ROSS”) regarding the letter filed by Thomson Reuters Enterprise Center GmbH and West Publishing Corporation (collectively “Plaintiffs”) on July 25, 2022, in support of their request to amend the Complaint.

The letter includes the following passage:

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED] *See Ex. A, von Simson Dep. Tr. 261:4–25, 264:2–21, 271:11–16;*  
*see also Ex. B, ROSS-010203134–ROSS-010203135* [REDACTED]  
[REDACTED]

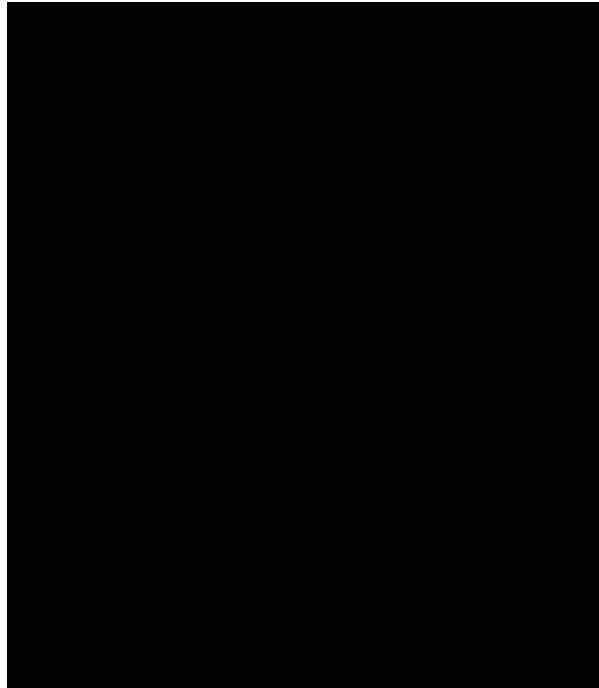
The statement made in this passage, that [REDACTED]  
[REDACTED] (emphasis in original) is materially misleading.  
[REDACTED]

The Honorable Stephanos Bibas

August 3, 2022

Page 2

*Von Simson Dep. Tr. 261:4-25 (Exhibit 1).*



*Von Simson Dep. Tr. 264:2-21 (Exhibit 2).*



The Honorable Stephanos Bibas

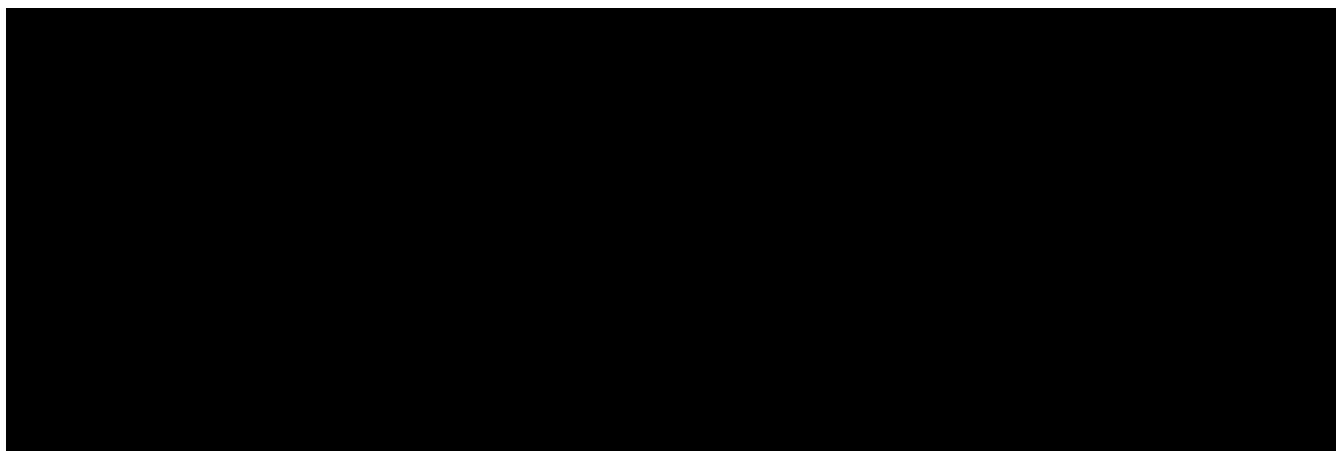
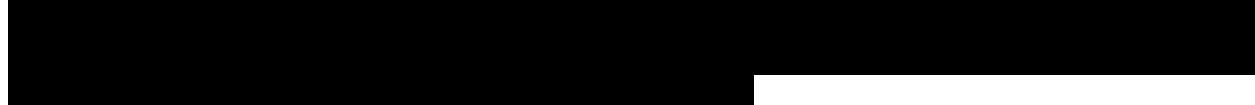
August 3, 2022

Page 3

*Von Simson Dep. Tr. 271:11-16 (Exhibit 3).*



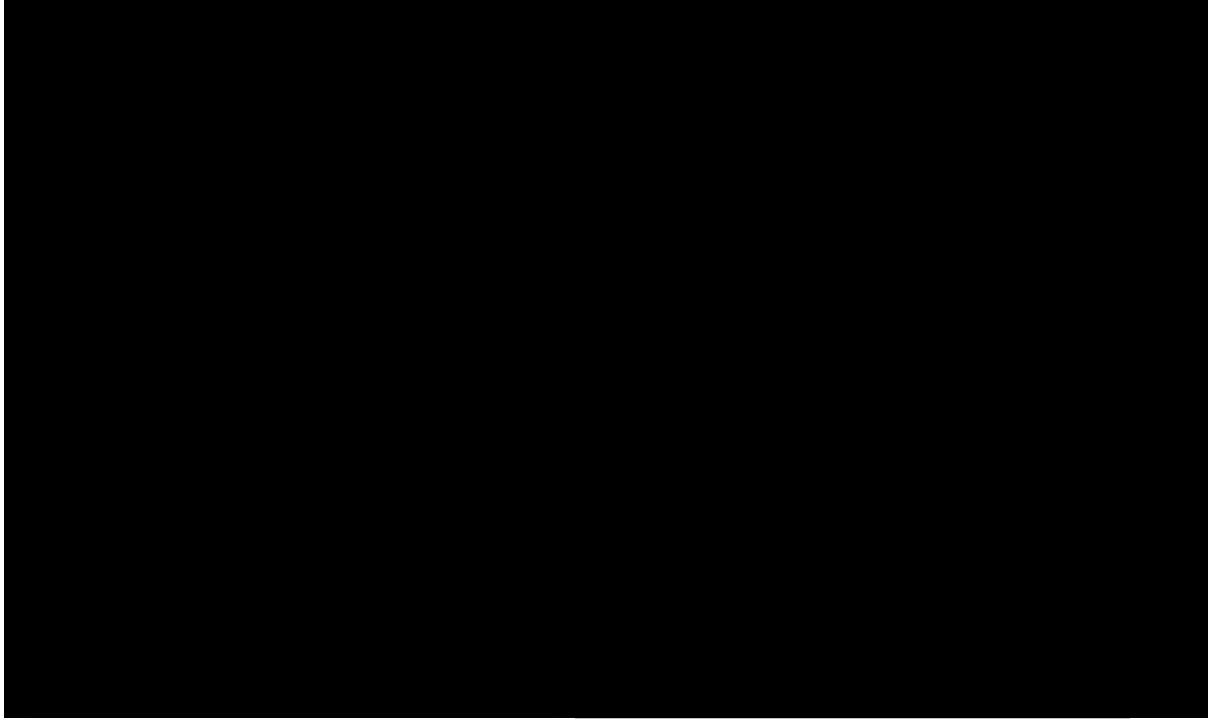
*ROSS-010203134-ROSS-010203135 (Exhibit 4).*



The Honorable Stephanos Bibas

August 3, 2022

Page 4



On August 2, 2022, counsel for ROSS notified counsel for Plaintiffs that it believed that this representation in their July 25, 2022 letter reply in support of their motion for leave to amend was materially misleading. *See Exhibit 5.* Counsel for ROSS requested that counsel for Plaintiffs notify the Court that they withdraw this statement from their letter. *Id* Counsel for ROSS stated that, if counsel for Plaintiffs do not withdraw this statement by 5:00 PM ET on August 3, 2022, that ROSS would send this letter to the Court. As counsel for Plaintiffs have not sought to withdraw this statement from their letter, we are notifying the Court of the above.

Respectfully,

*/s/ David E. Moore*

David E. Moore

DEM:nmt/10286849/20516.00001

Enclosures

cc: Counsel of Record (via electronic mail)